

The Arbitron Survey Area Definition Committee reserves the right to exercise its best professional judgement in modifying and/or waiving certain special procedures specified above, or overriding the requirement for station concurrence whenever strict adherence to these procedures could result in a Metro definition which would appear unreasonable or illogical in light of known topographic, geographic, historical or other exceptional circumstances.

TOTAL SURVEY AREA (TSA)

Definition

The Total Survey Area ("TSA") is a geographic area composed of those counties which, by Arbitron estimates, account for approximately 98% of the Net Weekly Circulation of all commercial home market stations, exclusive of counties located outside the MSA or ADI reached solely by communications satellite transmission. The TSA includes all of a market's Metro and ADI counties, plus all other additional counties necessary to account for 98% of the viewing to that market's commercial home stations. TSAs may overlap (unlike MSAs and ADIs) and, therefore, TSA audience estimates are not additive because of duplication.

TSA Update

All TSA definitions are reviewed before the beginning of each new survey year to evaluate the ability of the TSA definition to meet the "98% of viewing criteria". Evaluation and revision are based upon the annual report on Net Weekly Circulation, which is based upon viewing estimates from the four most current sweeps. Unlike ADI Updates, which are made at the beginning of the survey year only, TV stations may request TSA updates throughout the survey year if changing market conditions so warrant. Such market conditions might include, but are not limited to, expanded coverage due to new or more powerful transmitters, higher towers, new stations going on-the-air, new parent/satellite rebroadcast arrangements, or expanded cable system carriage.

Likewise, stations going off-the-air, cable system carriage changes, and changes in parent/satellite rebroadcast arrangements may cause existing TSA counties to no longer be assigned to a given market.

Stations may also request that a county be added or deleted from an existing TSA. Requests for changes in TSA definitions after the beginning of the new survey year must be made in writing to Arbitron's Television Policies and Procedures Department. After a TSA change is reviewed and determined by Arbitron to be warranted, the definition change is made as soon as practical and will again be addressed at the beginning of the next survey year.

These are some of the criteria that are considered in updating Total Survey Area definitions:

1. the primary consideration is that at least 98% of the Net Weekly Circulation of each commercial home station occurs within the defined TSA;
2. geographic continuity of TSA counties is maintained whenever possible;
3. counties with viewing to more than one home station are preferred over counties with viewing to a single home station; or
4. counties bordered on less than all sides by other TSA counties would be deleted from a TSA when there is no reportable circulation to any commercial home station. Counties may also be deleted when no longer required to account for 98% of the viewing to commercial home stations.

The Arbitron Survey Area Definition Committee reserves the right to exercise its professional research judgement in modifying and/or waiving certain procedures enumerated above whenever these procedures would result in a county addition or deletion which would appear unreasonable or illogical in light of known topographic, geographic, historical or other exceptional circumstances.

NON-ADI MARKET

Definition

A Non-ADI Market may be established when the city of license of a commercial station, which does not have a rebroadcast arrangement with any other station, is located in a county which is a county in the ADI, but not the Metro of a Metro Market. A Non-ADI Market includes only the Home County of such a station.

In cases where the county under consideration is contiguous to the current Metro Rating Area, and other marketing factors so warrant, the county may be added to the Metro Rating Area rather than be designated as a Non-ADI Market. (*See Metro Rating Area Policy.*)

A Non-ADI Market may be established when:

1. a new station, existing in a Non-Metro, ADI county area, comes on-the-air; or
2. an existing station, with a previously established ADI loses its ADI status, and would begin being reported in another Market Report.

Non-ADI Market Policy

During the annual ADI Update, the viewing level of the home station(s) in the Non-ADI Market is examined to determine whether the Non-ADI Market is entitled to its own independent ADI status. (*See Home County Policy.*)

In TSA updating, Non-ADI stations are considered home stations to their corresponding ADI markets, and TSA definitions for these ADI markets are designated to include the "98% area" of the Non-ADI stations.

Non-ADI markets which achieve separate ADI status may elect to become a new independent ADI or may elect to hyphenate their market name with another established ADI by exercising one of the two options below:

Option 1: Station(s) in a newly qualifying ADI may elect to make their market a permanent part of an established ADI and add their market name to that of the existing ADI. *The newly qualifying ADI relinquishes the right to become a separate ADI for all time.* The new market name will be the "OLD TOWN-NEW TOWN" ADI.

Option 2: The station(s) in a newly qualifying ADI may elect to continue their Non-ADI status and have their market name added temporarily to that of the existing ADI. The newly qualifying ADI retains its right to accept full ADI status in future years should the opportunity again arise. The new market name will be the "OLD TOWN including NEW TOWN" ADI. The new market will remain for one survey year only; however, it may be renewed for a subsequent survey year in the event that the Non-ADI Market again qualifies for ADI status.

Non-ADI Market stations are generally reported in the corresponding ADIs Market Report and designated as home Non-ADI stations.

ADJACENT ADI MARKETS

Adjacent ADI Markets are those other Areas of Dominant Influence which are in close geographic proximity to the Home Market ADI and in which there is viewing to the Home Market stations. Up to three adjacent ADIs may be designated for each ADI Market. When more than three adjacent ADIs overlap the Home Market's Total Survey Area, the cumulative Net Weekly Circulation of each adjacent ADI is ranked in descending order. The three highest ranked are selected, and TV household ratings for each appear in the Daypart Audience Estimates Section of the Market Report.

MARKET NAME

In the past, market names reflected a mixture of the name of the primary Metropolitan Statistical Area(s) ("MSA" as defined by the U.S. Office of Management and Budget), stations' cities of license, stations' cities of identification, plus historical industry usage.

The resulting maze of market names permitted neither uniform rules of application for definition nor stability of market identification. Therefore, effective with the 1972-73 survey year, Arbitron implemented the policy of only changing market names under the following conditions:

1. Market name changes are made to add the city of license of a new commercial home station or to delete the city of license of a station which goes off-the-air or becomes a satellite. (The name of the city of license of a satellite is never included in a market name.)

2. Effective with the 1983-84 survey year, and still continuing, market names may be changed to add the name of the city of license of any new or existing commercial non-satellite television station located in the defined Metro Rating Area or in a defined Home County of a market without a Metro Rating Area if: (i) the new or existing station requests the addition, in writing; and (ii) if the requesting station has met the home station Minimum Reporting Standard requirements of the Market Report in three consecutive surveys, including the most recent May survey.

When a city's name is added to the current name of a market, it will be positioned at the end of the existing market name.

Additions to market names will be effective with the beginning of the next subsequent survey year.

3. Effective with the 1985-86 survey year, Non-ADI markets which achieve ADI status and elect to hyphenate their market name with another established ADI may have their market name added to the name of the established ADI.

Arbitron reserves the right to exercise its discretion in continuing to include the name of a city which appears to no longer apply to the reported stations.

With some exceptions, market names are designed to contain the cities of license of all commercial home stations.

The name of any present Non-ADI Market that at one time had ADI status will be added to the name of the ADI Market in which it is currently located. The Non-ADI Market name will appear in parentheses. Exceptions will be considered if all Home Market stations present evidence that the name change would have an adverse effect.

Arbitron reserves the right to include or exclude the name of a station's city of license so as to best describe the market and which will not cause confusion with the names of adjacent markets.

SPLIT COUNTIES

A split county is a county that Arbitron has divided into more than one sampling unit because of its topographic features. Once split, each newly created part of the county is treated as separate units for sampling as well as ADI Update and TSA definition.

Arbitron splits counties when:

1. the county has unique topographic features which cause non-cable television households in one portion of the county to have a mutually exclusive viewing ability (not just viewing preference) from other television households in other part(s) of the county; and
2. each split must include at least 2,500 TV households and account for at least 10% of the total county's TV households.

INDEPENDENT CITIES

While counties are generally the primary units of state government, some cities are politically independent of the surrounding county.

Recognizing that independent cities are separate jurisdictions from their surrounding counties, Arbitron samples independent cities separately according to the criteria below.

In order for an independent city to qualify for separate sampling, it must:

1. have combined total of at least 100,000 households for all independent cities within the ADI; and
2. have a minimum of at least 35,000 households within the ADI for a combination of both the independent city and its surrounding county (the "Torus").

The following independent cities are processed as separate units in Market Reports. They will be processed and reported as separate units in Arbitron Coverage, annual ADI updates and TSA updates.

INDEPENDENT CITIES

Baltimore City, MD
St. Louis City, MO
Chesapeake City, VA
Hampton City, VA
Newport News City, VA
Norfolk City, VA
Portsmouth City, VA
Richmond City, VA
Suffolk City, VA
Virginia Beach City, VA

The following independent cities are clustered with the listed county in all Arbitron processes.

INDEPENDENT CITIES	STATE	COUNTY
Alexandria	VA	Arlington
Bedford	VA	Bedford
Bristol	VA	Washington
Buena Vista	VA	Rockbridge
Charlottesville	VA	Albemarle
Clifton Forge	VA	Alleghany
Colonial Heights	VA	Chesterfield
Covington	VA	Alleghany
Danville	VA	Pittsylvania
Emporia	VA	Greensville
Fairfax	VA	Fairfax
Falls Church	VA	Fairfax
Franklin	VA	Southampton
Fredericksburg	VA	Spotsylvania
Galax	VA	Grayson
Harrisonburg	VA	Rockingham
Hopewell	VA	Prince George
Lexington	VA	Rockbridge
Lynchburg	VA	Campbell
Manassas/Manassas Park	VA	Prince William
Martinsville	VA	Henry
Norton	VA	Wise
Petersburg	VA	Dinwiddie
Poquoson	VA	York
Radford	VA	Montgomery
Roanoke	VA	Roanoke
Salem	VA	Roanoke
South Boston	VA	Halifax
Staunton	VA	Augusta
Waynesboro	VA	Augusta
Williamsburg	VA	James City
Winchester	VA	Frederick

EXHIBIT B

LATE NIGHT PROGRAMS
ON INDEPENDENT STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
11:00PM-12:30AM (E/P TIME) 10:00PM-11:30PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK
1	HILL STREET BLUES	9	11	-2	9	NC	10	-1	8	+1	9	2	8	3	9	3	4	22
	SANFORD AND SON	7	8	+1	7	+2	10	-1	8	+1	9	4	9	1	10	2	25	2
3	CHEERS	15	7	+1	7	+1	8	NC	7	+1	8	4	8	3	8	5	10	7
	M.A.S.H.	8	9	-1	9	-1	10	-2	7	+1	8	4	8	3	9	3	8	10
	QUINCY	4	9	-1	9	-1	6	+2	8	NC	8	2	9	1	7	7	30	1
6	TONIGHT SHOW	3	9	-2	6	+1	7	NC	5	+2	7	2	6	12	5	15	8	10
	MORTON DOWNEY JR.	25	5	+2	4	+3	4	+3	5	+2	7	2	7	8	8	5	9	8
	night court	8	6	+1	5	+2	6	+1	8	-1	7	4	7	8	7	7	15	6
	STAR TREK	9	6	+1	7	NC	6	+1	6	+1	7	2	7	8	11	1	6	18
10	BARNEY MILLER	9	6	NC	6	NC	6	NC	5	+1	6	2	5	17	5	15	6	18
	BENSON	4	9	-3	8	-2	8	-2	6	NC	6	2	6	12	4	19	8	10
	FALL GUY	4	7	-1	9	-3	8	-2	7	-1	6	2	8	3	6	12	19	4
	FRIDAY 13TH(TV SERIES (O	7	7	-1	4	+2	4	+2	5	+1	6	1	4	21	7	7	9	8
	HONEYMOONERS	10	7	-1	6	NC	7	-1	7	-1	6	2	6	12	7	7	8	10
	I LOVE LUCY	3	6	NC	7	-1	6	NC	5	+1	6	1	8	3	5	15	25	2
	LOVE CONNECTION	18	5	+1	4	+2	4	+2	6	NC	6	2	7	8	4	19	7	15
	TAXI	12	7	-1	7	-1	7	-1	8	-2	6	2	6	12	7	7	8	10
18	LATE NITE 1	4	3	+2	2	+3	4	+1	3	+2	5	1	5	17	4	19	7	15
	MATT HOUSTON	3	6	-1	3	+2	2	+3	5	NC	5	1	3	26	1	29	1	26
	NEW NEWLYMED GAME	10	5	NC	4	+1	5	NC	6	-1	5	2	6	12	3	22	5	20
	SIMON AND SIMON	6	5	NC	4	+1	4	+1	5	NC	5	2	5	17	5	15	2	23
	THREE'S COMPANY	3	4	+1	3	+2	4	+1	7	-2	5	2	4	21	3	22	16	5
23	NEW DATING GAME	10	5	-1	4	NC	4	NC	5	-1	4	1	4	21	2	26	7	15
	ROCKFORD FILES	4	5	-1	4	NC	4	NC	5	-1	4	1	4	21	3	22	2	23
	TWILIGHT ZONE	5	5	-1	6	-2	6	-2	5	-1	4	1	5	17	6	12	1	26
	MURPHY IN CINCINNATI	6	5	-1	4	NC	4	NC	5	-1	4	2	4	21	6	12	1	26
27	gong show	14	5	-2	4	-1	4	-1	4	-1	3	1	3	26	2	26	5	20
	on trial (o	5	4	-1	5	-2	4	-1	5	-2	3	1	3	26	2	26	1	26
	TALES FROM DARKSIDE	4	3	NC	3	NC	2	+1	4	-1	3	1	2	29	3	22	2	23

LATE NIGHT PROGRAMS
ON NETWORK AFFILIATED STATIONS
NSI NOVEMBER 1988
101+ MARKETS - MONDAY-FRIDAY
11:00PM-12:30AM (E/P TIME) 10:00PM-11:30PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK
1	TONIGHT SHOW	86	29	-2	28	-1	27	NC	28	-1	27	6	26	3	23	4	12	12
	M.A.S.H.	21	24	+3	26	+1	27	NC	29	-2	27	8	29	1	29	1	30	5
	SIMON AND SIMON	3	19	+8	17	+10	22	+5	36	-9	27	4	19	8	28	2	46	1
4	THREE'S COMPANY	5	22	+2	26	-2	23	+1	28	-4	24	7	23	4	20	6	45	2
5	CHEERS	32	21	+2	23	NC	24	-1	26	-3	23	7	27	2	24	3	28	6
6	LATE NITE 1	73	19	+3	19	+3	21	+1	28	-6	22	3	22	6	17	8	23	7
7	newhart	4	22	-2	20	NC	22	-2	35	-15	20	6	22	6	19	7	10	14
8	BARNEY MILLER	4	20	-1	21	-2	16	+3	27	-8	19	5	15	14	12	14	33	3
	CURRENT AFFAIR (O	6	17	+2	19	NC	19	NC	29	-10	19	4	17	10	14	10	-	22
10	NEW NEHLYMED GAME	3	18	NC	21	-3	17	+1	26	-8	18	4	15	14	11	17	5	18
	usa today(tv show (o	6	21	-3	19	-1	21	-3	26	-8	18	5	19	8	14	10	13	10
12	STAR TREK-GENERATN (O	3	28	-11	31	-14	28	-11	32	-15	17	5	17	10	23	4	33	3
13	MAGNUM P.I.	7	18	-2	16	NC	17	-1	23	-7	16	3	15	14	13	13	9	15
	night court	9	16	NC	18	-2	18	-2	20	-4	16	5	17	10	16	9	6	16
	WIN LOSE OR DRAM	4	17	-1	17	-1	18	-2	26	-10	16	3	23	4	11	17	15	9
16	ABC-NITELINE	65	15	-1	16	-2	15	-1	22	-8	14	3	12	19	11	17	4	20
	FRIDAY 13TH(TV SERIES (O	9	14	NC	14	NC	16	-2	17	-3	14	2	14	18	12	14	12	12
	war of the worlds (o	4	10	+4	16	-2	17	-3	25	-11	14	2	12	19	14	10	19	8
19	it's a living	3	27	-15	27	-15	25	-13	21	-9	12	3	16	13	12	14	5	18
	LOVE CONNECTION	12	14	-2	10	+2	13	-1	18	-6	12	3	12	19	10	21	6	16
21	ANDY GRIFFITH SHOW	3	10	+1	8	+3	9	+2	11	NC	11	4	15	14	11	17	13	10
	ENTERTAINMENT TONIGHT	12	14	-3	12	-1	12	-1	20	-9	11	2	11	22	7	22	-	22
23	WKRP IN CINCINNATI	3	14	-4	15	-5	13	-3	17	-7	10	2	11	22	7	22	4	20
24	gong show	3	7	-4	5	-2	7	-4	8	-5	3	1	4	24	2	24	-	22

PRIME ACCESS PROGRAM
ON NETWORK AFFILIATED STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
7:00PM-8:00PM (E/P TIME) 6:00PM-7:00PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK	SHR	RANK
1	WHEEL OF FORTUNE	93	33	-3	32	-2	32	-2	26	+4	30	18	24	2	20	5	17	5		
2	JEOPARDY	54	28	NC	28	NC	27	+1	27	+1	28	16	23	3	20	5	13	8		
3	cosby show	30	19	+5	18	+6	19	+5	22	+2	24	14	28	1	24	2	37	1		
4	PM MAGAZINE	19	23	-1	22	NC	21	+1	24	-2	22	13	23	3	20	5	13	8		
5	CHEERS	10	17	+3	19	+1	20	NC	20	NC	20	11	22	6	23	3	17	5		
	night court	5	16	+4	15	+5	16	+4	22	-2	20	12	23	3	25	1	24	3		
7	M.A.S.H.	4	20	-2	19	-1	20	-2	16	+2	18	10	18	8	21	4	13	8		
8	ENTERTAINMENT TONIGHT	40	15	+2	16	+1	16	+1	17	NC	17	10	19	7	16	9	9	13		
	FAMILY TIES	4	18	-1	19	-2	20	-3	23	-6	17	10	18	8	16	9	32	2		
10	HOLLYWOOD SQUARES	4	21	-5	23	-7	23	-7	19	-3	16	10	15	13	13	11	13	8		
11	CURRENT AFFAIR (O	24	12	+3	13	+2	14	+1	13	+2	15	9	17	10	17	8	7	14		
	family feud	28	16	-1	15	NC	14	+1	15	NC	15	9	16	11	13	11	19	4		
13	WIN LOSE OR DRAW	64	17	-3	18	-4	18	-4	16	-2	14	8	16	11	12	15	17	5		
14	newhart	3	19	-6	18	-5	17	-4	22	-9	13	7	12	14	13	11	11	12		
15	usa today(tv show to	67	16	-4	17	-5	16	-4	19	-7	12	7	12	14	13	11	4	15		

PRIME ACCESS PROGRAMS
ON INDEPENDENT STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
7:00PM-8:00PM (E/P TIME) 6:00PM-7:00PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK
1	cosby show	12	12	+5	12	+5	12	+5	12	+5	17	10	21	1	17	1	41	1
2	night court	28	9	+3	9	+3	8	+4	11	+1	12	7	14	2	16	2	20	3
3	CURRENT AFFAIR (O	7	10	+1	11	NC	12	-1	11	NC	11	7	12	3	10	6	8	15
4	CHEERS	27	8	+2	9	+1	9	+1	9	+1	10	6	12	3	13	3	13	7
	FAMILY TIES	21	11	-1	11	-1	10	NC	10	NC	10	6	11	5	9	7	27	2
6	LOVE CONNECTION	3	9	-1	8	NC	9	-1	7	+1	8	5	11	5	9	7	6	17
	M.A.S.H.	19	9	-1	8	NC	8	NC	7	+1	8	5	9	7	11	5	10	12
8	newhart	15	9	-2	8	-1	8	-1	9	-2	7	4	8	8	8	9	12	10
	STAR TREK	10	6	+1	6	+1	6	+1	8	-1	7	4	7	9	12	4	12	10
10	A-TEAM	10	6	NC	6	NC	6	NC	7	-1	6	4	5	15	7	12	16	5
	FACTS OF LIFE	7	8	-2	7	-1	7	-1	7	-1	6	3	6	11	4	16	18	4
	kate and allie	8	6	NC	7	-1	6	NC	8	-2	6	4	6	11	5	14	14	6
	STAR TREK-GENERATN (O	4	4	+2	6	NC	4	+2	6	NC	6	3	6	11	8	9	13	7
	WKRP IN CINCINNATI	10	7	-1	7	-1	7	-1	7	-1	6	3	7	9	8	9	9	14
	THREE'S COMPANY	8	7	-1	9	-3	8	-2	7	-1	6	4	6	11	6	13	13	7
16	it's a living	5	4	NC	4	NC	4	NC	7	-3	4	2	4	16	4	16	6	17
	NEW NEWLYNED GAME	7	4	NC	4	NC	4	NC	4	NC	4	2	4	16	3	19	5	20
	TAXI	4	5	-1	6	-2	6	-2	7	-3	4	2	4	16	5	14	6	17
19	gidget	3	2	+1	1	+2	2	+1	4	-1	3	1	2	21	2	20	8	15
	gong show	6	3	NC	4	-1	4	-1	4	-1	3	2	4	16	4	16	10	12
21	NEW DATING GAME	3	5	-3	3	-1	3	-1	4	-2	2	1	3	20	2	20	2	21

DAYTIME PROGRAMS
ON INDEPENDENT STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
9:00AM-3:30PM (E/P TIME) 9:00AM-2:30PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK	SHR	RANK
1	GERALDO	3	9	+4	10	+3	11	+2	7	+6	13	3	17	1	22	1	5	48		
2	LITTLE HOUSE ON THE PRAIRIE	6	11	+1	10	+2	9	+3	12	NC	12	2	14	2	15	3	22	15		
3	ANDY GRIFFITH SHOW	21	9	NC	10	-1	10	-1	9	NC	9	2	10	3	17	2	14	27		
4	BARNABY JONES	4	10	-2	11	-3	11	-3	7	+1	8	2	4	23	9	16	3	60		
	FALL GUY	4	8	NC	5	+3	6	+2	7	+1	8	2	6	11	13	6	17	23		
	live w/regis kathie lee	5	10	-2	10	-2	8	NC	11	-3	8	2	8	6	11	11	6	41		
	alvin and chipmunks	18	7	+1	7	+1	7	+1	5	+3	8	2	3	35	5	33	33	3		
	DENNIS THE MENACE CARTOON	10	7	+1	8	NC	8	NC	5	+3	8	2	4	23	3	50	35	2		
	TOM AND JERRY	9	7	+1	7	+1	7	+1	7	+1	8	2	3	35	7	22	29	9		
10	HAPPY DAYS	11	9	-2	9	-2	7	NC	7	NC	7	2	6	11	12	7	12	33		
	HONEYMOONERS	3	11	-4	7	NC	9	-2	14	-7	7	2	5	18	14	5	4	52		
	I LOVE LUCY	38	8	-1	7	NC	7	NC	6	+1	7	2	9	4	9	16	13	30		
	LEAVE IT TO BEAVER	16	7	NC	7	NC	7	NC	7	NC	7	1	6	11	12	7	18	21		
	LOVE BOAT	4	9	-2	8	-1	8	-1	8	-1	7	2	9	4	5	33	8	37		
	FLINTSTONES	11	7	NC	7	NC	7	NC	6	+1	7	2	4	23	5	33	27	12		
	JETSONS	6	5	+2	7	NC	6	+1	5	+2	7	2	3	35	5	33	33	3		
	REAL GHOSTBUSTERS	9	7	NC	7	NC	7	NC	5	+2	7	2	3	35	7	22	33	3		
18	DIVORCE COURT	23	5	+1	6	NC	6	NC	6	NC	6	1	7	8	7	22	4	52		
	JUDGE	8	6	NC	7	-1	6	NC	6	NC	6	1	7	8	7	22	6	41		
	LAVERNE AND SHIRLEY	6	6	NC	6	NC	5	+1	7	-1	6	1	6	11	5	33	11	35		
	MAGNUM P.I.	4	8	-2	9	-3	9	-3	8	-2	6	2	4	23	11	11	6	41		
	on trial to	8	6	NC	9	-3	8	-2	5	+1	6	1	6	11	5	33	6	41		
	QUINCY	12	5	+1	7	-1	6	NC	6	NC	6	1	6	11	11	11	4	52		
	ROCKFORD FILES	7	5	+1	5	+1	6	NC	5	+1	6	1	5	18	15	3	5	48		
	SALLY-RAPHAEL	4	11	-5	13	-7	13	-7	6	NC	6	2	8	6	8	18	1	67		
	SUPERIOR COURT	7	6	NC	5	+1	5	+1	5	+1	6	1	6	11	12	7	5	48		
	THREE'S COMPANY	3	8	-2	7	-1	9	-3	4	+2	6	1	4	23	8	18	16	24		
	DOUBLE DARE	4	9	-3	9	-3	11	-5	10	-4	6	1	2	46	3	50	16	24		
	gumby	7	5	+1	5	+1	5	+1	5	+1	6	1	2	46	4	46	40	1		
	MY LITTLE PONY	17	8	-2	8	-2	6	NC	7	-1	6	1	2	46	3	50	33	3		
	POPEYE	8	6	NC	5	+1	5	+1	5	+1	6	2	2	46	6	29	28	11		
	WOODY WOODPECKER FRIENDS	12	6	NC	7	-1	6	NC	5	+1	6	2	2	46	6	29	32	7		
33	BENSON	4	8	-3	8	-3	4	+1	10	-5	5	1	7	8	12	7	7	38		
	BRADY BUNCH	7	6	-1	7	-2	7	-2	6	-1	5	1	3	35	5	33	15	26		
	GILLIGAN'S ISLAND	8	4	+1	5	NC	5	NC	5	NC	5	1	3	35	10	14	13	30		
	OUR MAGAZINE	16	6	-1	5	NC	6	-1	8	-3	5	1	5	18	4	46	4	52		
	I DREAM OF JEANNIE	46	5	NC	5	NC	4	+1	5	NC	5	1	4	23	7	22	10	36		
	LOVE CONNECTION	7	5	NC	5	NC	5	NC	3	+2	5	1	4	23	10	14	4	52		
	NEW NEWMYED GAME	33	4	+1	5	NC	4	+1	5	NC	5	1	4	23	5	33	5	48		
	TRAPPER JOHN MD	7	6	-1	5	NC	6	-1	6	-1	5	1	5	18	6	29	7	38		

DAYTIME PROGRAMS
ON INDEPENDENT STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
9:00AM-3:30PM (E/P TIME) 9:00AM-2:30PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK
46	TOO CLOSE FOR COMFORT	7	6	-1	7	-2	5	NC	6	-1	5	1	4	23	8	18	12	33
	care bears	10	5	NC	4	+1	4	+1	5	NC	5	1	2	46	3	50	26	13
	JEM	10	5	NC	5	NC	5	NC	6	-1	5	1	2	46	2	60	23	14
	SMURFS	17	5	NC	5	NC	5	NC	5	NC	5	1	2	46	3	50	22	15
	TEDDY RUXPIN	5	5	NC	6	-1	5	NC	4	+1	5	1	1	59	1	64	30	8
	family medical center	8	6	-2	8	-4	8	-4	5	-1	4	1	5	18	8	18	3	60
	GIMME A BREAK	4	5	-1	8	-4	5	-1	6	-2	4	1	3	35	3	50	4	52
	group one medical	5	10	-6	8	-4	7	-3	5	-1	4	1	3	35	5	33	2	64
	HOLLYWOOD SQUARES	23	4	NC	4	NC	4	NC	4	NC	4	1	3	35	5	33	6	41
	MORK AND MINDY	8	4	NC	5	-1	5	-1	5	-1	4	1	4	23	7	22	13	30
	NEW DATING GAME	38	5	-1	5	-1	4	NC	4	NC	4	1	3	35	6	29	4	52
	SANFORD AND SON	3	3	+1	2	+2	2	+2	2	+2	4	1	2	46	5	33	6	41
	SIMON AND SIMON	3	8	-4	8	-4	7	-3	7	-3	4	1	4	23	7	22	3	60
	sweethearts	6	5	-1	6	-2	5	-1	6	-2	4	1	4	23	5	33	2	64
	BUGS BUNNY	4	4	NC	4	NC	3	+1	3	+1	4	1	1	59	2	60	14	27
58	SCOOBY DOO	14	4	NC	4	NC	4	NC	3	+1	4	1	1	59	3	50	29	9
	THUNDERCATS	8	3	+1	3	+1	2	+2	3	+1	4	1	1	59	3	50	21	17
	DIFFERENT STROKES	3	6	-3	6	-3	6	-3	5	-2	3	1	2	46	4	46	6	41
	gidget	36	3	NC	4	-1	3	NC	4	-1	3	1	2	46	3	50	7	38
	gong show	16	3	NC	4	-1	4	-1	4	-1	3	1	2	46	5	33	3	60
	wipeout lo	11	4	-1	4	-1	4	-1	3	NC	3	1	3	35	4	46	4	52
	finders keepers	4	5	-2	4	-1	4	-1	5	-2	3	1	1	59	3	50	14	27
	GHOSTBUSTERS	6	3	NC	3	NC	3	NC	3	NC	3	1	1	59	2	60	19	19
	G.I. JOE	4	6	-3	6	-3	5	-2	3	NC	3	1	1	59	1	64	19	19
	snorks	11	3	NC	3	NC	3	NC	3	NC	3	1	1	59	1	64	20	18
66	JEFFERSONS	3	2	NC	2	NC	2	NC	2	NC	2	1	2	46	2	60	2	64
	COMIC STRIP	3	2	NC	3	-1	2	NC	4	-2	2	1	1	59	1	64	18	21

EARLY FRINGE PROGRAMS
ON NETWORK AFFILIATED STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
3:30PM-7:00PM (E/P TIME) 2:30PM-6:00PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		M2554		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK
1	OPRAH WINFREY SHOW	91	31	+5	33	+3	33	+3	24	+12	36	12	48	1	29	1	6	25
2	WHEEL OF FORTUNE	4	28	+4	28	+4	29	+3	30	+2	32	15	27	3	19	10	13	11
3	cosby show	51	21	+5	21	+5	20	+6	18	+8	26	11	31	2	27	3	31	2
	JEOPARDY	42	27	-1	27	-1	27	-1	24	+2	26	10	25	6	23	7	5	26
5	ANDY GRIFFITH SHOW	7	22	NC	22	NC	21	+1	25	-3	22	8	25	6	29	1	20	5
	DONAHUE	43	22	NC	22	NC	22	NC	20	+2	22	8	26	5	20	8	3	37
	GERALDO	35	17	+5	17	+5	18	+4	21	+1	22	8	27	3	26	4	4	29
8	CHEERS	14	17	+2	20	-1	20	-1	20	-1	19	8	23	8	24	6	10	16
	M.A.S.H.	20	19	NC	19	NC	20	-1	17	+2	19	7	18	11	25	5	9	19
10	PEOPLES COURT	82	20	-2	20	-2	20	-2	19	-1	18	7	17	13	17	14	4	29
11	DIVORCE COURT	21	17	NC	18	-1	17	NC	21	-4	17	6	15	17	14	20	3	37
	family feud	40	18	-1	18	-1	17	NC	18	-1	17	6	17	13	15	18	8	22
	hour magazine	7	26	-9	20	-3	22	-5	22	-5	17	5	18	11	8	34	1	46
14	ENTERTAINMENT TONIGHT	5	19	-3	20	-4	19	-3	17	-1	16	7	19	10	18	12	5	26
	JEFFERSONS	5	21	-5	19	-3	21	-5	16	NC	16	6	15	17	17	14	15	8
	JUDGE	41	17	-1	17	-1	17	-1	19	-3	16	5	14	22	14	20	4	29
	SUPERIOR COURT	31	17	-1	18	-2	17	-1	17	-1	16	5	14	22	16	16	4	29
	MIN LOSE OR DRAW	31	18	-2	19	-3	17	-1	21	-5	16	5	20	9	13	25	7	24
19	A-TEAM	4	19	-4	16	-1	17	-2	17	-2	15	5	11	35	18	12	17	7
	CURRENT AFFAIR (O	26	17	-2	16	-1	15	NC	19	-4	15	5	17	13	14	20	4	29
	DIFFERENT STROKES	10	20	-5	18	-3	20	-5	22	-7	15	4	14	22	11	29	18	6
	night court	17	16	-1	17	-2	16	-1	15	NC	15	6	17	13	20	8	10	16
	SIMON AND SIMON	5	18	-3	20	-5	17	-2	24	-9	15	5	13	26	15	18	3	37
24	LOVE CONNECTION	17	15	-1	17	-3	17	-3	18	-4	14	4	15	17	13	25	3	37
	newhart	5	15	-1	15	-1	16	-2	17	-3	14	5	15	17	16	16	8	22
	on trial (o	4	18	-4	15	-1	16	-2	24	-10	14	5	12	32	19	10	5	26
	THREE'S COMPANY	10	16	-2	16	-2	13	+1	12	+2	14	5	13	26	14	20	12	14
28	FACTS OF LIFE	17	15	-2	15	-2	15	-2	13	NC	13	4	13	26	8	34	15	8
	FAMILY TIES	33	16	-3	16	-3	14	-1	16	-3	13	5	13	26	12	28	14	10
	GIMME A BREAK	7	17	-4	19	-6	18	-5	16	-3	13	4	12	32	10	32	13	11
	Kate and allie	13	17	-4	16	-3	16	-3	15	-2	13	5	14	22	13	25	9	19
	LITTLE HOUSE ON THE PRAIRIE	9	19	-6	17	-4	17	-4	18	-5	13	4	15	17	11	29	11	15
	SILVER SPOONS	4	17	-4	15	-2	14	-1	14	-1	13	5	13	26	7	37	21	4
	DUCK TALES	5	14	-1	16	-3	16	-3	20	-7	13	4	7	39	8	34	42	1
35	usa today(tv show (o	10	18	-7	19	-8	18	-7	16	-5	11	5	10	37	9	33	2	44
	WEBSTER	7	18	-7	17	-6	15	-4	19	-8	11	4	12	32	7	37	13	11
37	MAGNUM P.I.	8	17	-7	16	-6	14	-4	19	-9	10	3	11	35	14	20	3	37
	st. elsewhere (o	3	13	-3	12	-2	10	NC	12	-2	10	3	13	26	11	29	4	29
39	HOLLYWOOD SQUARES	13	13	-4	12	-3	12	-3	14	-5	9	3	8	38	7	37	4	29
	DOUBLE DARE	5	13	-4	12	-3	11	-2	13	-4	9	3	5	44	5	43	23	3

EARLY TRINGE PROGRAMS
ON NETWORK AFFILIATED STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
3:30PM-7:00PM (E/P TIME) 2:30PM-6:00PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87			FEB 88			MAY 88			LEAD-IN			NOVEMBER 1988			M2554			KIDS		
			SHR	+/-		SHR	+/-		SHR	+/-		SHR	+/-		SHR	RTG		SHR	RANK		SHR	RANK	
41	BENSON	3	10	-2		8	NC		8	NC		8	NC		8	3		6	42		7	37	
	family medical center	5	12	-4		11	-3		12	-4		16	-8		8	3		7	39		6	42	
43	sweethearts	4	17	-10		18	-11		13	-6		13	-6		7	2		6	42		7	37	
44	group one medical	13	15	-9		15	-9		15	-9		18	-12		6	2		7	39		5	43	
	wipeout (o	5	9	-3		9	-3		8	-2		9	-3		6	2		4	45		5	43	
46	c.o.p.s.	3	5	-2		4	-1		2	+1		3	NC		3	1		1	48		2	46	
47	NEM DATING GAME	3	3	-1		2	NC		3	-1		2	NC		2	1		2	46		2	46	
48	NEM NEWLYNED GAME	4	2	-1		2	-1		2	-1		4	-3		1	1		2	46		1	48	

EARLY FRINGE PROGRAMS
ON INDEPENDENT STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
3:30PM-7:00PM (E/P TIME) 2:30PM-6:00PM (C/M TIME)

HH SHAP RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK	SHR	RANK
1	DUCK TALES	88	10	+1	12	-1	11	NC	9	+2	11	4	5	28	6	20	39	1		
2	CHEERS	9	11	-1	11	-1	11	-1	9	+1	10	6	12	1	12	1	16	36		
	FAMILY TIES	31	10	NC	9	+1	8	+2	8	+2	10	5	11	3	8	8	23	17		
	GIMME A BREAK	8	12	-2	12	-2	12	-2	10	NC	10	5	11	3	7	12	26	8		
	night court	4	9	+1	9	+1	8	+2	9	+1	10	5	11	3	11	3	22	21		
6	DIFFERENT STROKES	12	10	-1	10	-1	10	-1	8	+1	9	4	7	15	5	29	25	12		
	FACTS OF LIFE	32	10	-1	10	-1	10	-1	8	+1	9	4	9	9	5	29	22	21		
	kate and allie	7	7	+2	8	+1	7	+2	8	+1	9	5	12	1	7	12	22	21		
	LOVE CONNECTION	3	10	-1	9	NC	9	NC	9	NC	9	4	10	6	11	3	7	62		
	M.A.S.H.	3	14	-5	14	-5	12	-3	11	-2	9	5	10	6	9	5	10	55		
	SILVER SPOONS	37	9	NC	10	-1	10	-1	8	+1	9	4	7	15	6	20	26	8		
	THREE'S COMPANY	21	11	-2	11	-2	10	-1	9	NC	9	5	9	9	8	8	20	27		
13	BRADY BUNCH	21	8	NC	9	-1	9	-1	8	NC	8	3	6	23	4	40	24	14		
	GOOD TIMES	4	6	+2	7	+1	9	-1	7	+1	8	4	8	12	6	20	21	26		
	newhart	5	10	-2	10	-2	10	-2	8	NC	8	4	10	6	9	5	10	55		
	PUNKY BREWSTER	18	8	NC	8	NC	8	NC	7	+1	8	4	5	28	3	49	30	6		
	WEBSTER	42	9	-1	9	-1	8	NC	8	NC	8	4	7	15	4	40	27	7		
	DISNEY/WORLD OF DISNEY	6	9	-1	9	-1	9	-1	11	-3	8	4	8	12	7	12	33	2		
	alvin and chipmunks	54	8	NC	8	NC	7	+1	6	+2	8	2	3	44	4	40	33	2		
	DENNIS THE MENACE CARTOON	24	8	NC	8	NC	8	NC	6	+2	8	2	4	36	6	20	33	2		
21	ANDY GRIFFITH SHOW	14	6	+1	8	-1	7	NC	6	+1	7	3	9	9	9	5	16	36		
	MAGNUM P.I.	4	11	-4	11	-4	9	-2	6	+1	7	4	8	12	7	12	8	60		
	fun house	54	7	NC	7	NC	7	NC	8	-1	7	3	4	36	3	49	26	8		
	G.I. JOE	6	7	NC	6	+1	7	NC	7	NC	7	2	2	54	5	29	23	17		
	JETSONS	34	6	+1	7	NC	7	NC	7	NC	7	2	3	44	4	40	24	14		
	REAL GHOSTBUSTERS	46	8	-1	8	-1	8	-1	7	NC	7	2	3	44	5	29	26	8		
	SCOOPY DOO	13	7	NC	8	-1	8	-1	7	NC	7	2	4	36	6	20	33	2		
	TOM AND JERRY	12	6	+1	7	NC	7	NC	6	+1	7	2	3	44	5	29	24	14		
29	A-TEAM	15	7	-1	7	-1	7	-1	5	+1	6	3	5	28	7	12	14	44		
	HAPPY DAYS	18	7	-1	7	-1	7	-1	7	-1	6	3	5	28	5	29	18	32		
	JEFFERSONS	5	6	NC	7	-1	7	-1	7	-1	6	3	6	23	5	29	15	40		
	KNIGHT RIDER	9	6	NC	6	NC	6	NC	7	-1	6	3	5	28	6	20	17	33		
	LAVERNE AND SHIRLEY	4	6	NC	6	NC	6	NC	5	+1	6	3	5	28	4	40	15	40		
	LEAVE IT TO BEAVER	10	7	-1	6	NC	7	-1	6	NC	6	2	6	23	6	20	11	51		
	9 TO 5	3	8	-2	7	-1	7	-1	7	-1	6	3	6	23	5	29	10	55		
	new leave it to beaver	11	7	-1	7	-1	6	NC	7	-1	6	3	6	23	6	20	22	21		
	SANFORD AND SON	4	5	+1	6	NC	6	NC	5	+1	6	4	7	15	8	8	16	36		
	STAR TREK	6	5	+1	6	NC	6	NC	5	+1	6	3	7	15	12	1	10	55		
	BUGS BUNNY	7	4	+2	5	+1	6	NC	5	+1	6	2	3	44	5	29	22	21		
	c.o.p.s.	32	6	NC	6	NC	7	-1	6	NC	6	2	2	54	3	49	19	29		

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EARLY FRINGE PROGRAMS
ON INDEPENDENT STATIONS
NSI NOVEMBER 1988
TOP 100 MARKETS - MONDAY-FRIDAY
3:30PM-7:00PM (E/P TIME) 2:30PM-6:00PM (C/M TIME)

HH SHARE RANK	PROGRAM	NO. OF STATIONS	NOV 87		FEB 88		MAY 88		LEAD-IN		DMA HH		NOVEMBER 1988		M2554		KIDS	
			SHR	+/-	SHR	+/-	SHR	+/-	SHR	+/-	SHR	RTG	SHR	RANK	SHR	RANK	SHR	RANK
	DOUBLE DARE	66	8	-2	8	-2	8	-2	8	-2	6	2	3	44	3	49	23	17
	FLINTSTONES	15	6	NC	6	NC	6	NC	5	+1	6	2	3	44	4	40	19	29
	THUNDERCATS	4	8	-2	6	NC	6	NC	8	-2	6	2	2	54	2	58	15	40
	WOODY WOODPECKER FRIENDS	25	6	NC	7	-1	7	-1	6	NC	6	2	3	44	5	29	25	12
45	BENSON	3	5	NC	5	NC	5	NC	4	+1	5	3	7	15	6	20	12	48
	GILLIGAN'S ISLAND	7	4	+1	5	NC	4	+1	4	+1	5	2	4	36	4	40	12	48
	gong show	7	5	NC	6	-1	5	NC	6	-1	5	2	5	28	8	8	14	44
	LITTLE HOUSE ON THE PRAIRIE	9	5	NC	6	-1	7	-2	5	NC	5	3	7	15	3	49	14	44
	TAXI	4	6	-1	7	-2	6	-1	5	NC	5	3	7	15	7	12	12	48
	WKRP IN CINCINNATI	6	6	-1	7	-2	7	-2	5	NC	5	3	5	28	7	12	11	51
51	I DREAM OF JEANNIE	3	5	-1	4	NC	3	+1	4	NC	4	2	4	36	7	12	17	33
	it's a living	4	7	-3	8	-4	6	-2	5	-1	4	2	4	36	3	49	7	62
	NEW DATING GAME	6	4	NC	5	-1	4	NC	3	+1	4	2	3	44	3	49	5	64
	NEW NEWLYNED GAME	5	5	-1	5	-1	5	-1	4	NC	4	2	4	36	4	40	5	64
	finders keepers	38	5	-1	6	-2	6	-2	5	-1	4	1	2	54	2	58	15	40
	GHOSTBUSTERS	5	5	-1	5	-1	6	-2	6	-2	4	1	2	54	4	40	19	29
	MY LITTLE PONY	6	5	-1	4	NC	5	-1	5	-1	4	1	1	61	2	58	23	17
	POPEYE	10	5	-1	4	NC	5	-1	4	NC	4	1	2	54	3	49	13	47
	SHURFS	6	5	-1	5	-1	6	-2	4	NC	4	1	1	61	2	58	17	33
	teenage mutant-turtles	3	4	NC	4	NC	4	NC	5	-1	4	2	1	61	5	29	11	51
61	gidget	8	4	-1	4	-1	4	-1	4	-1	3	1	3	44	3	49	11	51
	HOLLYWOOD SQUARES	4	6	-3	6	-3	5	-2	4	-1	3	2	4	36	2	58	5	64
	gunby	7	3	NC	3	NC	4	-1	4	-1	3	1	1	61	2	58	20	27
	snorks	5	5	-2	4	-1	4	-1	4	-1	3	1	1	61	2	58	16	36
65	care bears	4	1	+1	3	-1	2	NC	2	NC	2	1	1	61	2	58	10	55
	JEM	5	5	-3	2	NC	2	NC	4	-2	2	1	2	54	2	58	8	60

EXHIBIT C

KATZ COMMUNICATIONS_{INC}

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(212) 572-5500

January 13, 1989

Joe Belisle
Leibowitz & Spencer
3050 Biscayne Blvd.
Suite 501
Miami, Fla. 33137

Dear Joe:

I have been asked by WWSB, a station Katz represents, to comment on the programming implications of rescission of the so-called "35 mile" rule protecting the ability of small market stations to freely purchase and air syndicated programs.

In my experience, I have found that the "35 mile" rule is essential for small market stations.

Programming decisions do not exist in a vacuum. There is a great deal of disparity among syndicated programs in their ability to attract an audience and generate ratings. For example, for network affiliates, talk shows demonstrably work best in holding existing viewers leading out of a network soap opera block. Additionally, certain specific series work best within categories. For example, OPRAH works best among all talk shows as a soap opera lead-out, JEOPARDY delivers a greater proportion of its viewership to an early local newscast, and so on. Skillful programmers capitalize on such data in deciding which shows to buy and how to position them. While there are regional and other variables which must be taken into account, the general principles of programming -- relative to creating audience tune-in, maximizing the retention of existing viewers, and preventing channel switching -- are remarkably stable across all markets. As a consequence, a station will either have the most effective vehicles to accomplish specific tasks, or it won't.

Consider the plight of a programmer in a single station market, such as Sarasota. The station has a distinct geographic area which it serves. While its network programming may also be available to area viewers through spill-in signals from stations outside the area, it meets its own market obligations through expensive news coverage and public affairs programming. It also provides a unique method for local and regional advertisers to reach consumers. The syndicated programming the station acquires must be able to generate the best possible ratings to help maintain the advertising revenues that support the unique services it provides its market. It would be inherently unfair for a larger station in a surrounding market to prevent the single station market from acquiring the programs that most effectively assist it in this task.

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Joe Belisle

Page 2

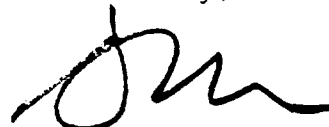
If the "35 mile" rule were rescinded, single station markets would be denied the programming that is essential for them to compete. This would mean that not only would they not be able to purchase the most effective series to accomplish specific programming objectives, they would also be denied the next most effective series, the third most effective series, and perhaps all viable programming options in cases where there are multiple stations in the surrounding larger markets. If such a station were denied these programming options, their ratings would decline, endangering the station's ability to provide news and public affairs programs. Moreover, a ratings decline could result in the station falling below the minimum levels established by Arbitron relative to the "10% home county rule," which would result in the station losing its market designation.

Even though single station markets are currently protected by the "35 mile" rule, syndicators still attempt to foil it, primarily by "not opening the market." Such action protects larger stations whose overall ratings picture includes measurement of their signals in the adjacent smaller markets. Without access to the best product, the ratings for such disadvantaged stations are kept artificially low.

Katz has worked with a number of its stations to invoke the '35 mile' rule and ensure fair access to all syndicated product. It is clear to us that without the "35 mile" rule, these stations would once again be prevented from buying many important series, artificially and unfairly suppressing their ratings and revenues, and endangering their ability to provide essential news and public affairs services.

Katz supports the "35 mile" rule in the most emphatic terms. We have seen why it is needed, and we have seen how it can be used for the betterment of the viewing public.

Sincerely,

A handwritten signature in black ink, appearing to be 'DS' or 'Smith', written in a cursive style.

David Smith
Director of Programming
KATZ COMMUNICATIONS